

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Reading)**

IN RE: ALEXANDER MICHAEL BRADER-SIMS Debtor	Case No. 23-11723-pmm
Weichert Financial Services, Movant	Chapter 13
vs. ALEXANDER MICHAEL BRADER-SIMS And Tristan Douglas Brader-Sims and Andrea Jean Huxel, (NON-FILING CO-DEBTOR'S) Respondents	11 U.S.C. §362 and §1301

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

Weichert Financial Services (hereinafter “Movant”) has filed a Motion for Relief from the Automatic Stay and Co-Debtor Stay with the Court.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant relief sought in the motion or if you want the Court to consider your views on the motion, then on or before **February 6, 2024**, you or your attorney must do all of the following:

(a) file an answer explaining your position at:

Clerk’s Office, U.S. Bankruptcy Court
Eastern District of Pennsylvania
The Gateway Building
201 Penn Street, Suite 103
Reading, PA 19601

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

Brock and Scott, PLLC
3825 Forrestgate Drive
Winston Salem, NC 27103

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on **February 13, 2024 at 10:00 AM**, in Courtroom 4th Floor, United States Bankruptcy Court, The Gateway Building, 201 Penn Street, Reading, PA 19601.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorneys named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office in Reading at (610) 208-5040 to find out whether the hearing has been cancelled because no one filed an answer.

January 23, 2024

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CERTIFICATE OF SERVICE

I hereby certify that service upon all interested parties, indicated below was made by sending true and correct copies of the Notice of Motion and Motion for Relief from the Automatic Stay at the addresses shown below or on the attached list on **January 23, 2024**.

The types of service made on the parties were: Electronic Notification and First Class Mail.

Service by First Class Mail

ALEXANDER MICHAEL BRADER-SIMS
2303 WASHINGTON AVE
NORTHAMPTON, PA 18067-1143

TRISTAN DOUGLAS BRADER-SIMS
425 WHITE STREET
WEISSPORT, PA 18235

ANDREA JEAN HUXEL
425 WHITE STREET
WEISSPORT, PA 18235

Service by Electronic Notification

MICHAEL A. CIBIK
Cibik Law, P.C.
1500 Walnut Street
Suite 900
Philadelphia, PA 19102
mail@cibiklaw.com

SCOTT F. WATERMAN [Chapter 13]
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606
ECFMail@ReadingCh13.com

United States Trustee
Office of United States Trustee
Robert N.C. Nix Federal Building
900 Market Street
Suite 320
Philadelphia, PA 19107
USTPRegion03.PH.ECF@usdoj.gov

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading “Service by Electronic Notification” and those served by mail will be listed under the heading: Service by First Class Mail.

This is the 23rd day of January, 2024.

/s/Andrew Spivack
Andrew Spivack, PA Bar No. 84439
Matthew Fissel, PA Bar No. 314567
Mario Hanyon, PA Bar No. 203993
Ryan Starks, PA Bar No. 330002
Jay Jones, PA Bar No. 86657
Attorney for Creditor
BROCK & SCOTT, PLLC
3825 Forrestgate Drive
Winston Salem, NC 27103
Telephone: (844) 856-6646
Facsimile: (704) 369-0760
E-Mail: PABKR@brockandscott.com